

Exhibit H

Schwartz, Barbara

From: Goldberg, Seth A.
Sent: Monday, January 25, 2021 9:55 AM
To: Adam Slater; Priselac, Jessica
Cc: Christopher Geddis; George T. Williamson; Cheryll Calderon; Layne Hilton; Hill, Coleen W.; Schwartz, Barbara; Hansen, Forrest; Bonner, Kelly
Subject: RE: ZHP deposition calendar

Adam:

Given that Judge Schneider approved the schedule of dates with some overlap of witnesses, especially given his requirement that dates be provided for the witnesses whose depositions are the subject of pending or forthcoming protective order motions, we proposed a few changes to try to avoid depositions over the weekends and to reduce the overlap caused by the scheduling of the disputed witnesses, who may ultimately not be deposed. As those proposed changes were not acceptable, and you have only proposed a few changes in your email of January 15, we will plan on moving ahead with the deposition schedule set by Judge Schneider. However, we can agree to the modifications you proposed on January 15 regarding the start dates for Minli Zhang, Linda Lin and Peng Dong. Instead of moving Xavier Tang up or back, as you suggested, we propose moving Jie Wang up to 3/22-23, and we propose moving Xioadi Guo to 3/24-3/25, neither Jie Wang nor Xoadi Guo require translation. Given our acceptance of your proposed changes re Minli Zhang, Linda Lin, and Peng Dong, please confirm that our proposed changes for Jie Wang and Xiaodi Guo are acceptable.

We seem to be in agreement that the depositions should be conducted in 5-hr blocks, beginning at 7:00 pm, and run until completed. If you disagree with that timing, let me know.

Based on the above, using 5-hr blocks beginning at 8:00am Shanghai time, the schedule would be as follows. The highlighted witnesses are those whose depositions have not yet been ordered and our subject to protective order motions, and the bolded witnesses require translation.

March 1: **Minli Zhang**
March 4: **Qingming Li**
March 8: **Eric Tsai**
March 9: Eric Gu
March 11: **Jucai Ge**, **Lucy Liu**
March 15: Linda Lin
March 16: **Yuelin Hu**
March 18: Min Li
March 19: **Karen Xu**
March 22: **Jie Wang**
March 24: Xioadi Guo
March 25: **Xavier Tang**
March 29: **Peng Dong**
April 1: **Boahuan Chen**



From: Adam Slater <ASlater@mazieslater.com>

Sent: Friday, January 22, 2021 4:05 PM

To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>

Cc: Christopher Geddis <CGeddis@mazieslater.com>; George T. Williamson <gwilliamson@farr.com>; Cheryll Calderon <ccalderon@mazieslater.com>; Layne Hilton <l.hilton@kanner-law.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hansen, Forrest <FRHansen@duanemorris.com>; Bonner, Kelly <KABonner@duanemorris.com>

Subject: Re: ZHP deposition calendar

Hi Seth - we are really struggling with this schedule. We would like to find a way to work together to eliminate the double and triple tracking of depositions. As to some of the witnesses you suggested pushing depositions into April, but we are not sure if the Court will allow that, and we are trying to figure out how we can spread out the others. For example, by pushing some of the deponents into the unused parts of the calendar. Can you suggest some alternatives along those lines so we can try to work together on this?

Thanks,

Adam Slater

From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>

Sent: Friday, January 22, 2021 8:57 AM

To: Priselac, Jessica <JPriselac@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>

Cc: Christopher Geddis <CGeddis@mazieslater.com>; George T. Williamson <gwilliamson@farr.com>; Cheryll Calderon <ccalderon@mazieslater.com>; Layne Hilton <l.hilton@kanner-law.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hansen, Forrest <FRHansen@duanemorris.com>; Bonner, Kelly <KABonner@duanemorris.com>

Subject: Re: ZHP deposition calendar

Adam,

Can you let us know today whether the below is acceptable?

Seth

Seth A. Goldberg
Duane Morris LLP
215-979-1175

sagoldberg@duanemorris.com

On Jan 19, 2021, at 11:12 AM, Goldberg, Seth A. <SAGoldberg@duanemorris.com> wrote:

Adam:

Following up on our call this morning, here are the changes to the schedule we propose to avoid depositions through the weekends in March.

The below assumes 5 hour blocks of testimony per witness on consecutive days, beginning at 7:00 pm eastern time, and factors in the 75% for translation time needed for Minli Zhang, Qingming Li, and Linda Lin:

1. Starting Minli Zhang (24.5 hrs) and Qingming Li (18.5 hrs) the evening of Sunday, February 28.
2. Starting Ge Jucai (18.5 hrs) the evening of Sunday, March 7 or Monday, March 8.
3. Starting Linda Lin (18.5 hrs) and Min Li (17.5hrs) the evening of Sunday, March 14.
4. Starting Peng Dong (24.5) the evening of Sunday, March 28

The other depositions of China-based employees already ordered by the Court would begin as follows, using 5 hour blocks on consecutive days, beginning at 7:00 pm eastern, and factoring in translation time for Peng Dong:

1. Starting Eric Gu (10.5 hrs) the evening of March 9
2. Starting Jie Wang (10.5 hrs) the evening of March 23

Were we to add the seven disputed witnesses to the March schedule based on the dates the Court has approved, using 5 hour blocks on consecutive days, beginning at 7:00 pm eastern, and factoring in translation time for Lucy Liu, Yuelin Hu, Karen Xu, Xavier Tang, and Baouhan Chen, their depositions would begin as follows:

3. Starting Lucy Liu (12.25 hrs) the evening of Monday, March 8
4. Starting Yuelin Hu (12.25 hrs) the evening of Monday, March 15
5. Starting Karen Xu (12.25 hrs) the evening of Wednesday, March 17
6. Starting Xavier Tang (12.25 hrs) the evening of Wednesday, March 24
7. Starting Baohuan Chen (12.25 hrs) the evening of Wednesday, March 31

However, given that adding the disputed witnesses to the schedule results in potential triple-tracking depositions, we propose finding dates in April for their testimony, should the Court deny the ZHP parties' protective order motions as to these depositions.

Lastly, we propose finding dates in April for Eric Tsai (12.25 hrs, including translation) and Xioadi Guo (7 hrs), as they are currently scheduled for dates that could result in triple-tracking. However, we may be able to find other dates in March for these witnesses once the schedule of witnesses the Court has already approved is finalized.

Please let us know at your earliest convenience this week if the above is agreeable.

Seth

<image001.jpg>

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From: Priselac, Jessica <JPriselac@duanemorris.com>

Sent: Sunday, January 17, 2021 11:25 AM

To: 'Adam Slater' <ASlater@mazieslater.com>

Cc: Christopher Geddis <CGeddis@mazieslater.com>; George T. Williamson <gwilliamson@farr.com>; Cheryll Calderon <ccalderon@mazieslater.com>; Layne Hilton <l.hilton@kanner-law.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>

Subject: RE: ZHP deposition calendar

Adam,

We are available to discuss this and the Hai Wang issue tomorrow at 4 pm or Tuesday at 9 am. Please let us know if you are available at either of those times.

Best regards,

Jessica

Jessica Priselac

Attorney at Law

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From: Adam Slater <ASlater@mazieslater.com>

Sent: Friday, January 15, 2021 11:33 AM

To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>

Cc: Christopher Geddis <CGeddis@mazieslater.com>; George T. Williamson <gwilliamson@farr.com>; Cheryll Calderon <ccalderon@mazieslater.com>; Layne Hilton <l.hilton@kanner-law.com>

Subject: ZHP deposition calendar

Hi Seth:

Per the conference the other day, we need to reconcile the calendar before any Order can be entered. Your proposed calendar is not able to be entered since it has multiple dates that were offered for a number of witnesses who are single day deponents. We also need to work to avoid two or more witnesses per day, as the protocol precludes this, but that is impossible with the dates offered. In that connection, we have selected dates below based on what you offered but this calendar does not comport with the protocol. This remains an unresolved problem. In order to move things along, please let us know as to the following dates that we select based on what you have offered, with the understanding that we really need to drill down on this since this creates a multi-tracking problem throughout the month:

January is set with John Iozzia on January 20, and Lijie Wang on January 26.

February is set with Remonda Gergis on February 2, Hai Wang on February 9-10, and Jun Du on February 17.

March includes:

Minli Zhang - March 2-3

Quingming Li - March 4-5

Xiaodi Guo - March 5 (That week has multiple witnesses, can we start Minli Zhang on March 1, and push Xiadi Guo to March 6?)

Eric Tsai - March 8

Eric Gu - March 9-10

Lucy Liu - March 10

Jucal Ge - March 11-12

Linda Lin - March 16-17

Yuelin Hu - March 17 (That week has multiple witnesses, can we start Linda Lin on March 15?)

Min Li - March 18-20

Karen Xu - March 19

Jie Wang - March 24-25

Xavier Tang - March 25 (We think another day that week would be smarter since Jie Wang is also that week - please advise re: March 23 or March 26 or 27)

Peng Dong - March 30-31

Baohua Chen - April 1 (In order to avoid overlap, can we start Peng Dong on March 29?)

I think this is pretty comprehensive, but if I missed something let me know. Please let me know your thoughts, including on how we eliminate the overlap with multiple depositions on many days.

Of course, we also still need to factor in the 75% additional time, and address the start and stop times due to the time zone issue. I am interested in your thoughts on that as well.

I will emailing Judge Schneider to let him know that we are working on the calendar per the discussion at the conference.

Thank you,

Adam Slater

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